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November 17, 2020

VIA ELECTRONIC FILING

Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, SC 29211

Re: South Carolina Energy Freedom Act (House Bill 3659) Proceeding to Address S.C. Code Ann. Section 58-27-460(A)(1) and S.C. Code Ann. Section 58-27-460(A)(2) (Promulgation and Periodic Review of Standards for Interconnection and Parallel Operation of Generating Facilities to an Electrical Utility's Distribution and Transmission System) Docket No. 2019-326-E

Dear Ms. Boyd:

I am writing on behalf of Dominion Energy South Carolina, Inc. ("DESC") to indicate DESC's support for the limited enabling revisions to the South Carolina Generator Interconnection Procedures, Forms, and Agreements (the "South Carolina Standard") proposed by Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (collectively, "Duke"). These changes are set forth in Attachment 1 to Duke's Joint Application in this docket and are further detailed in Section IV of the same. DESC appreciates Duke's willingness to work in a collaborative fashion and appreciates Duke's efforts to move this initiative forward in a timely manner.

These limited enabling revisions to the South Carolina Standard incorporate feedback from DESC and will provide both Duke and DESC the flexibility to study interconnection requests under the existing serial study process or a Commission-approved cluster-study process. Although Duke's Joint Application also requests approval of a cluster-study proposal specific to Duke, DESC anticipates filing a proposal for a DESC-specific cluster-study process at a later date as part of the phased approach approved by the Commission in this docket.¹

¹ DESC notes that this phased approach was an accommodation to ensure that Duke could implement the cluster-study process in a timely manner across each of its jurisdictions. As such, although DESC anticipates filing a cluster-study proposal in "phase two," it may also propose certain other modifications to the South Carolina Standard that would apply to both Duke and DESC.

In short, DESC supports the limited enabling revisions to the South Carolina Standard that Duke proposes in Attachment 1 of its Joint Application. These changes are an important first step in implementing the queue reform contemplated by Act 62, and DESC looks forward to proposing additional modifications in phase two of this docket. DESC appreciates the Commission's attention to these matters.

Sincerely,

A handwritten signature in blue ink that reads "J. Ashley Cooper". The signature is fluid and cursive, with the first name "J." and last name "Cooper" clearly legible.

J. Ashley Cooper

JAC:hmp

Enclosure

cc: (Via Electronic Mail and First Class Mail)
All Parties of Record